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August 16 1993

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United States Environmental Protection Agency Region VI Contingency Response Branch ATTN Don Smith P O Box 303 Dallas Texas 75201 9998 405 001

RE FACILITY RESPONSE PLAN ARKANSAS TERMINALING AND TRADING (AT&T) NORTH LITTLE ROCK ARKANSAS

As per my conversation with Mike Williams with your office on August 16 1993 EnecoTech Inc (Enecotech) on behalf of our client Truman Arnold Companies (TAC) is submitting to your office a copy of the Spill Prevention Control and Countermeasures (SPCC) Plan as a first draft of the required Facility Response Plan (FRP) for the above referenced facility. As you suggested included with the SPCC Plan are the Response Plan Cover Sheets a self determination of substantial harm worksheet a worst case discharge planning distance and calculations and a contract certification with SpilTech Services Inc of Little Rock Arkansas to clean up a worst case discharge. Additional information will follow this initial package.

The planning distance was done using the information for *Oil Transport on Still Water* (Appendix C to Part 112) due to the fact that the facility is partially located on a wetland. It was concluded that the planning distance is approximately 25 miles (see attached calculations sheet). The Arkansas River is located within this 25 mile distance and is used for a public water source.

Using this information it has been determined that the AT&T facility meets the qualifications for requiring an FRP due to the potential of substantial harm to the surrounding areas according to the Determination of Substantial Harm section of Attachment G 2 of the Federal Register Part II (40 CFR Part 112) dated February 17 1993

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If you have any questions or comments regarding this submittal please contact our office at (501) 224-8001

Sincerely,

ENECOTECH INC

Lisa M Brannan
Staff Engineer

Enclosures

LMB/RLG/lmb

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